

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

IN RE:

ALTHEIA HUGGINS
SS# XXX-XX-2495

§
§
§ CHAPTER 13
§
DEBTOR(S) § CASE NO. BK 15-11839-JDW13

RESPONSE TO DEBTOR'S OBJECTION TO SECURED CLAIM

COMES NOW, Vanderbilt Mortgage and Finance, Inc., a secured creditor in this bankruptcy proceeding, and responds and objects to the Debtor's Objection to Secured Claim (Dkt. #13) as follows:

1. Vanderbilt Mortgage and Finance, Inc. is the holder of a secured claim in this Chapter 13 proceeding as evidenced by the documents attached to its Proof of Claim filed in this proceeding.

2. Vanderbilt Mortgage and Finance, Inc. objects to the proposed valuation of its collateral and modification of its secured claim.

WHEREFORE, Vanderbilt Mortgage and Finance, Inc., moves this Honorable Court deny Debtor's objection and set this matter for hearing and for other such relief to which it may be entitled.

Date: June 17, 2015

/s/ Robin E. Pate

Robin E. Pate (MS BAR #103449)

Attorney for Vanderbilt Mortgage And Finance, Inc.
File No. 52872.219

OF COUNSEL

ROSEN ♦ HARWOOD, P.A.
2200 Jack Warner Parkway, Suite 200
Post Office Box 2727
Tuscaloosa, Alabama 35403
Telephone: (205) 344-5000

CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing upon the following:

By depositing a copy of same in a pre-addressed, stamped envelope with adequate postage prepaid thereon and properly addressed to the following:

Altheia Huggins
Debtor
489 Little Snow Creek Road
Holly Springs, MS 38635

Via the Court's Electronic mailing service (CM/ECF):

Karen B. Schneller (karen.schneller@gmail.com via CM/ECF Noticing Services)
Attorney for Debtor
P.O. Box 417
Holly Springs, MS 38635

Locke D. Barkley (jcollier@barkley13.com via CM/ECF Noticing Services)
Trustee
6360 I-55 North
Suite 140
Jackson, MS 39211

U. S. Trustee (USTPRegion05.AB.ECF@usdoj.gov via CM/ECF Noticing Services)
Trustee
501 East Court Street
Suite 6-430
Jackson, MS 39201

This the 17th day of June, 2015.

/s/ Robin E. Pate

Robin E. Pate (MS BAR #103449)
Of Counsel for Vanderbilt Mortgage and Finance, Inc.